

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS  
NORTHERN DISTRICT

SUPERIOR COURT

Crystal Sorey, Individually and as Administratrix  
of the Estate of Harmony Montgomery

Granted



Honorable David A. Anderson  
December 4, 2025

v.

State of New Hampshire, Department of Health and Human Services,  
Division of Children, Youth, and Families ("DCYF")

#216-2024-CV-00722

**ASSENTED-TO MOTION TO CONTINUE THE STAY**

NOW COME the plaintiffs, Crystal Sorey, individually and as Administratrix of the Estate of Harmony Montgomery, by and through her attorneys, Douglas, Leonard & Garvey, P.C., and with the defendant's assent, hereby move this Court to continue the stay, stating as follows:

1. Approval of the settlement agreement is still pending in the 9<sup>th</sup> Circuit – Probate Division – Nashua (#316-2024-ET-00225).
2. The Probate Court held a hearing on October 28, 2025. However, additional information is required before the Probate Court can issue a ruling on the settlement agreement, which is not expected to be available for approximately 60 to 90 days.
3. The parties request that the stay be extended to allow the parties to proceed in probate court as required under the settlement agreement.
4. Until the probate court proceeding is concluded, the parties cannot file

Docket Markings in this matter.

Clerk's Notice of Decision  
Document Sent to Parties

on 12/09/2025

5. Extending the stay promotes judicial economy because it allows the parties to address issues in probate court without the need to involve this Court.

6. The parties will provide this Court a further status report or file a Motion to Lift the Stay in 90 days.

7. The parties do not request a status conference but will provide additional information if requested by the Court.

8. Counsel for the Defendant assents to the relief sought herein.

WHEREFORE, Plaintiffs pray that this Honorable Court:

- A. Grant this Motion to Continue the Stay for 90 days and order the parties to file a further status report in 90 days or file a Motion to Lift the Stay; and
- B. Grant such other and further relief as is just and equitable.

Respectfully submitted,  
CRYSTAL SOREY  
By her attorneys,  
DOUGLAS, LEONARD & GARVEY, P.C.

Date: December 3, 2025

By: /s/ C. Kevin Leonard  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been electronically served through ECF this date to all counsel of record.

/s/ C. Kevin Leonard  
C. Kevin Leonard